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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION and  
PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

- ☐ Affects PG& E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)

Bankruptcy Case No. 19-30088 (DM)

Chapter 11 (Lead Case) (Jointly  
Administered)

**NOTICE PURSUANT TO 11 U.S.C.  
§ 546(b)(2) RELATED TO PERFECTION,  
MAINTENANCE AND ENFORCEMENT  
OF MECHANICS LIEN CLAIMS**

**HYDROCHEM'S NOTICE OF PERFECTION, MAINTENANCE AND ENFORCEMENT  
OF MECHANICS LIEN CLAIMS PURSUANT TO  
BANKRUPTCY CODE SECTION 546(b)(2)**

**PLEASE TAKE NOTICE THAT** pursuant to section 546(b)(2) of title 11 of the United States Code (11 U.S.C. §§ 101 *et seq.*, the "Bankruptcy Code"), HydroChemPSC, Hydrochem, LLC and other affiliated entities (collectively the "HydroChem Entities") hereby provide notice of mechanics liens, corresponding secured claims, and enforcement rights held one or more of the HydroChem Entities against property of one or both of the above-referenced debtors (the

1 “Debtors”) and (ii) reserve all related and other rights, claims and interests they may have in the  
2 subject Chapter 11 cases.

3 **PLEASE TAKE FURTHER NOTICE THAT** one or more of the HydroChem Entities  
4 filed certain lien statements (the “Lien Statements”) reflecting properly recorded and perfected  
5 mechanics liens against certain property owned by one or both of the Debtors. True and correct  
6 copies of the Lien Statements are attached hereto as **Exhibit A**.

7 **PLEASE TAKE FURTHER NOTICE THAT** pursuant to and consistent with  
8 Bankruptcy Code sections 362(b)(3) and 546(b)(1), one or more of the HydroChem Entities filed  
9 the Lien Statements and hereby give notice of their lien interest in all of the property that is  
10 subject to the liens, its corresponding secured claims, and its enforcement rights against the  
11 property, within the time fixed by California law for the commencement of an action to enforce  
12 its mechanics lien rights. The HydroChem Entities have filed this single Notice in the above-  
13 captioned Chapter 11 cases intending it to apply or pertain separately and individually to (a) the  
14 continued perfection of each and every one of the subject liens set forth in the Lien Statements,  
15 (b) the actions that otherwise would have been commenced by one or more of the HydroChem  
16 Entities in accordance with California state law to maintain, enforce and realize upon their  
17 corresponding secured claims and (c) the HydroChem Entities’ exercise of any other rights under  
18 or satisfaction of any other requirements of Bankruptcy Code section 546(b)(2) in the  
19 circumstances. The HydroChem Entities reserve all of their rights under applicable state and  
20 federal law.

21 Dated: April 24, 2019

**Pepper Hamilton LLP**

22 /s/ Francis J. Lawall

23 Francis J. Lawall, Esquire

24 Pepper Hamilton, LLP

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